

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

JONATHAN R., <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
v.)	
)	
JIM JUSTICE, in his official capacity as Governor of West Virginia, <i>et al.</i> ,)	Case No. 3:19-cv-00710
)	
)	
<i>Defendants.</i>)	

**DEFENDANTS' SUPPLEMENTAL
TRIAL FACT WITNESS SUMMARIES**

Defendants have prepared brief summaries of the testimony of the fact witnesses they expect to call or may call at trial. These summaries are not comprehensive. Since Defendants do not know exactly what evidence and theories Plaintiffs will put forth during trial, these witnesses may testify to facts not disclosed herein.

A. Fact witnesses Defendants expect to call at trial:

1. Secretary Cynthia A. Persily, Ph.D.
One Davis Square
Charleston, WV 25301
(304) 558-0684 (phone)

Dr. Persily is the Secretary of the Department of Human Services (“DoHS”). Dr. Persily will be asked to testify about her leadership of DoHS, the resources West Virginia is devoting and will devote to child welfare, DoHS’s priorities, the status and performance of the child welfare system, and DoHS’s efforts to improve the child welfare system.

2. Cammie Chapman
One Davis Square, Suite 100 East
Charleston, WV 25301
(304) 558-0628 (phone)

Cammie Chapman has served as the Deputy Secretary for Children and Adult Services, within DoHS, since November 2022. Ms. Chapman will be asked to testify about the

operation of West Virginia's child welfare system, the delivery of health care services to foster children (including through West Virginia's Medicaid program), DoHS's efforts related to community-based placements and services for children in care, implementation of the Memorandum of Understanding with the United States Department of Justice ("DOJ MOU"), and the impact of the relief Plaintiffs seek on the child welfare system.

3. Jeffrey Pack
1900 Kanawha Boulevard, East
Charleston, WV 25305
(304) 558-3317 (phone)

Jeff Pack served as Commissioner of the Bureau for Social Services ("BSS") from August 2021 to August 2024. Mr. Pack will be asked to testify about the operation of the child welfare system; the performance and efforts of DoHS's caseworkers; continuous quality improvement; and DoHS's efforts to decrease caseworker caseloads, improve support for caseworkers, improve placements, and improve case planning.

4. Lisa Roberts
2211 Congress Street
Portland, ME 04102
(208) 329-0723 (phone)

Lisa Roberts has been a consultant at BerryDunn since February 2021. In that role, she provides consulting services to DoHS. Ms. Roberts will be asked to testify about BerryDunn's work with DoHS to implement the DOJ MOU.

1. Melanie Urquhart
350 Capitol Street, Suite 718
Charleston, WV 25301
(304) 792-7095 (phone)

Melanie Urquhart is the Deputy Commissioner for Field Operations of the South Region for BSS. Ms. Urquhart will be asked to testify about case planning and her leadership of district managers and supervisors; BSS's case work improvement processes; reflective supervision; case work practice and policies such as the multidisciplinary team's role and meaningful contact; and the performance of BSS case workers and outcomes for children in foster care.

B. Fact witnesses Defendants may call at trial if the need arises:

1. Cynthia Parsons
350 Capitol Street, Room 251
Charleston, WV 25301
(304) 352-4254 (phone)

Cynthia Parsons is the Director of Behavioral Health and Long-Term Care within West Virginia's Bureau for Medicaid Services ("BMS"). Depending on Plaintiffs' case-in-chief, Ms. Parsons may be asked to testify about the medical, mental and behavioral health, and other services and coverage BMS provides to foster children through Medicaid. She may also be asked to testify about BMS's programs designed to ensure foster children receive all medically necessary care, including Mountain Health Promise.

2. Kim Ricketts
350 Capitol Street
Charleston, WV 25301
(304) 352-4493 (phone)

Kim Ricketts was appointed to replace Jeffrey Pack in his role as Commissioner of BSS in August 2024. Depending on Plaintiffs' case-in-chief, Ms. Ricketts may be asked to testify about her work at BSS, her plans for leading BSS, and challenges facing West Virginia's child welfare system.

3. Matt Croft
69 16th Street
Wheeling, WV 26003
(304) 232-4411 (phone)

Matt Croft is the supervisor for the Institutional Investigation Unit ("IIU") within BSS. Depending on Plaintiffs' case-in-chief, Mr. Croft may be asked to testify about IIU's investigatory policies and practices for suspected maltreatment in-care and rates of maltreatment in West Virginia.

4. Jessica Kennedy
350 Capitol Street
Charleston, WV 25301
(681) 443-6178 (phone)

Jessica Kennedy is the project manager for implementation of the new information system, People's Access to Help ("PATH"), within BSS. Depending on Plaintiffs' case-in-chief, Ms. Kennedy may be asked to testify about the improvements for children in care and information collection and management facilitated by PATH; BSS's efforts to develop, test, and implement PATH; and the quality of data.

5. Rhonda Larew
P.O. Box 1736
Romney, WV 26757
(304) 822-6900 (phone)

Rhonda Larew is the Director of the Division of Planning and Quality Improvement within BSS. Depending on Plaintiffs' case-in-chief, Ms. Larew may be asked to testify about

BSS's strategic efforts to monitor and improve the safety, permanency, and well-being of children in foster care.

6. Laura Hunt
One Davis Square, Suite 100, East
Charleston, WV 25301
(304) 421-5871 (phone)

Laura Hunt is the Director of the Office of Quality Assurance for Children's Programs within BSS. Depending on Plaintiffs' case-in-chief, Ms. Hunt may be asked to testify about efforts to monitor and improve the delivery of community-based services to children in care, the number of foster children placed in the community, and the provision of mental and behavioral health services to foster children.

7. Andrea Ramsey-Mitchell
350 Capitol Street, B18
Charleston, WV 25301
(304) 352-4519 (phone)

Andrea Ramsey-Mitchell is a Program Manager within BSS, whose areas of responsibility include development of community partnerships and administration of the Interstate Compact on the Placement of Children. Depending on Plaintiffs' case-in-chief, Ms. Ramsey-Mitchell may be asked to testify about BSS's efforts to support appropriate providers and placements and to ensure out-of-state placements comply with applicable regulations and policies.

8. Lorie Bragg
407 Neville Street
Beckley, WV 25801
(304) 256-6930 (phone)

Lorie Bragg is the Director of Program Support within BSS. Depending on Plaintiffs' case-in-chief, Ms. Bragg may be asked to testify about BSS's efforts to minimize out-of-state and residential placements.

9. Kendra Boley-Rogers
707 Professional Park Drive
Summersville, WV 26651
(304) 872-0803 (phone)

Kendra Boley-Rogers is a Program Manager within BSS. Depending on Plaintiffs' case-in-chief, Ms. Boley-Rogers may be asked to testify about BSS's efforts to find community-based placements for foster children, to recruit and retain foster families, and the role and activities of Child Placing Agencies.

10. Amanda Queen

PO Box 1268
Weston, WV 26452
(304) 269-6820 (phone)

Amanda Queen is the Director for Human Resources within BSS. Depending on Plaintiffs' case-in-chief, Ms. Queen may be asked to testify about BSS's efforts to hire, recruit, and retain caseworkers, supervisors, and other employees, including, among others, raising salaries and implementing retention bonuses.

11. Jessica Weisman
14 Hickory Terrace
Asheville, NC 28806
(845) 270-0059 (phone)

Jessica Weisman is the Director of Medical Illustration for Cogent Legal. Depending on whether Plaintiffs accept Defendants' evidentiary stipulations, Ms. Weisman may be asked to authenticate visual representations Defendants may display during trial.

12. Julie Spence
2699 Park Avenue, Suite 100
Huntington, WV 25704
(304) 528-5800 (phone)

Julie Spence is a Social Services Manager within BSS. Depending on Plaintiffs' case-in-chief, Ms. Spence may be asked to testify about the process of serving a child in foster care, caseworker practices and capabilities, the practical challenges caseworkers face, and BSS's support of caseworkers.

13. Stephanie Lester
407 Neville Street
Beckley, WV 25801
(304) 256-6932 (phone)

Stephanie Lester is a Social Services Manager within BSS. Depending on Plaintiffs' case-in-chief, Ms. Lester may be asked to testify about the process of serving a child in foster care, caseworker practices and capabilities, the practical challenges caseworkers face, and BSS's support of caseworkers.

14. Gabriela Romualdo
1225 19th Street Northwest
Washington, DC 20036
(202) 499-4258 (phone)

Gabriela Romualdo is a Litigation Specialist at Brown and Peisch PLLC. Depending on whether Plaintiffs accept Defendants' evidentiary stipulations, Ms. Romualdo may be

asked to testify to the authenticity of certain summaries of data Defendants' may introduce at trial.

October 1, 2024

Respectfully submitted,

/s/ Philip J. Peisch

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